

May 21, 2015

VIA ELECTRONIC FILING

Hon. Nancy Joseph
United States District Court,
Eastern District of Wisconsin
517 E. Wisconsin Avenue
Milwaukee, WI 53202

RE: Gonzales v. Kohn Law Firm S.C.
Case No. 13-CV-168
Our File No. 713.01

Dear Judge Joseph:

Defendants respectfully ask the Court to disregard Plaintiff's supplemental letter brief of May 15, 2015. While plaintiff claims she "just learned about" both of the unpublished cases cited as "supplemental authorities," *Kobilka v. Cottonwood*, Case No. 14-cv-268-wmc, 2015 WL 1137471 (W.D. Wis. Mar. 12, 2015), was cited and discussed in Defendant's reply brief filed over a month and a half ago. The case confirms that *Rooker-Feldman* applies when a garnishee claiming injuries arising from a garnishment fails to challenge state-court garnishment orders, and Plaintiff's attempts to distinguish the case are the same arguments she relied on to (unsuccessfully) distinguish Defendants' other authorities. She also cites *Sheetz v. Norwood*, No. 14-1732, 2015 WL 14111936 (7th Cir. 2015), for the proposition that *Rooker-Feldman* cannot apply to a non-party to the state-court proceedings. Even if the Court ignores that Plaintiff was a party to the state garnishment proceedings, *Sheetz* has no precedential value, pursuant to Circuit Rule 32.1. and is contrary to binding Seventh Circuit cases cited by Defendants. (*See* Dkt. #93, p. 10, n. 6). Accordingly, the Court should strike Plaintiff's supplemental arguments.

Very truly yours,

/s/ Joan M. Huffman

Counsel for Kohn Law Firm

cc: Mary C. Fons (via electronic filing)
DeVonna Joy (via electronic filing)